


EXHIBIT 77

STANDARD OPERATING PROCEDURE

		Title: CAGE / VAULT SUSPICIOUS ORDER MONITORING	
No.: DEA-53012		Version: 00	Effective: 12/23/2013
Department: DEA COMPLIANCE			

PURPOSE: To provide requirements for monitoring and reporting by cage/vault distribution center employees and CIII-V order entry employees customer orders that are of unusual size, frequency or deviates from normal pattern.

SCOPE: This procedure applies to Qualitest cage / vault distribution center employees as well as employees responsible for CIII-V order entry and 222 form entry.

DEFINITIONS:

Order of Interest	An order that appears based on the skill, customer knowledge and experience of the Qualitest employee to significantly deviate from the customer's normal ordering pattern.
Controlled Substance	A drug or other substance, or immediate precursor, included in schedule I, II, III, IV, or V in Title 21 U.S.C.
List 1 Chemical	A chemical specified by regulation of the Attorney General as a chemical that is used in manufacturing a controlled substance in violation of Title 21 U.S.C. and is important to the manufacture of the controlled substance.
Suspicious Order	An order for a controlled substance or List 1 chemical which is of an unusual size, frequency, and/or deviates substantially from a normal pattern.


RESPONSIBILITY: Cage / vault distribution center employees, CIII-V order entry and 222 entry employees are responsible for the execution of this SOP.

SAFETY: N/A

REFERENCES: N/A

ATTACHMENTS: N/A

Please discard any electronic printouts after 24 hours. 9/21/2018

		Title: CAGE / VAULT SUSPICIOUS ORDER MONITORING	
No.: DEA-53012		Version: 00	Effective: 12/23/2013
Department: DEA COMPLIANCE			

PROCEDURE:

I. Controlled Substance or List 1 Chemical Orders of Interest

- A. Controlled Substance or List 1 Chemical orders of interest may consist of one or more of the following:
 - 1. Controlled Substance or List 1 Chemical orders do not match customer's order pattern
 - 2. Controlled Substance or List 1 Chemical order quantity is of unusual size for customer
 - 3. Customer order frequency has steadily increased
 - 4. Others factors deemed unusual from employee's knowledge of customer
- B. If during the course of entering or picking orders for Controlled Substances or List 1 chemicals the employee identifies an order of interest, the employee notifies his /her supervisor. The supervisor alerts the SOM team for further review.
- C. The SOM team reviews the order and follows the Identifying, Blocking & Reporting SOP.
- D. If the order is deemed suspicious it is reported to the DEA by the Director, DEA Compliance or designee.

END SOP

REVISION HISTORY:
REV00 – NEW SOP